

Privacy Policy

OPENDRUMS

Last updated: 20/06/2026

1. Data Controller

The Data Controller for the personal data collected through this website, the mailing list, and activities related to the OPENDRUMS project is:

OPENDRUMS Team (Giovanni Villani, Domenico Manta)

OPENDRUMS Project

Email: team@opendrums.it

For any questions regarding the processing of your personal data, you can contact us at the email address indicated above.

2. What data we collect and why

We collect personal data through various sources, listed below. Regardless of the source, email addresses collected for newsletter purposes flow into a single management tool, Brevo, described at the end of this section.

2.1 Website visitors

Data collected	Purpose	Legal basis
Technical browsing data (IP, browser, pages visited)	Technical operation of the website	Legitimate interest (Art. 6.1.f GDPR)
Aggregated SEO ranking data (Google Search Console)	Improve the website's visibility in search engines	Legitimate interest (Art. 6.1.f GDPR)

Google Search Console: we use this Google tool to monitor the site's performance in search results (keywords, ranking, clicks). Site ownership verification is carried out via DNS record and does not involve installing cookies or tracking scripts on visitors' devices. The data processed by Search Console is aggregated and relates to search performance, not to individual user behavior. More information is available in Google's privacy policy (policies.google.com/privacy).

Statistical analysis tools: the website does not currently use traffic analysis or user-behavior tracking tools (e.g. Google Analytics, advertising pixels). Should we decide to activate one in the future, this policy will be updated accordingly and, where required by law, explicit consent will be requested via a dedicated cookie banner before activation.

2.2 Contacts collected via forms (website, Google Form, events/trade fairs)

We collect email addresses to send the OPENDRUMS project newsletter through various channels, all of which share the requirement of obtaining explicit and specific consent prior to collection:

- a) Form directly on the website: newsletter sign-up form integrated into the site, with explicit consent via checkbox and a double opt-in procedure (see section 2.3).
- b) Google Forms collected at events and trade fairs: on some occasions (e.g. public events, trade fairs) we collected expressions of interest via Google Form. In these forms, the email address was requested only after the data subject had: (i) reviewed a privacy notice compliant with Art. 13 GDPR, available as the first section of the form; and (ii) answered affirmatively to a specific question about receiving updates on

the OPENDRUMS project. This therefore constitutes free, specific, and informed consent, collected in digital written form.

- c) Other contact-collection forms we may use in the future (e.g. forms integrated directly into Brevo for events, dedicated landing pages), always subject to explicit and specific consent collected at the time of sign-up.

Data collected	Purpose	Legal basis
Email address	Sending newsletters and updates on the OPENDRUMS project	Consent (Art. 6.1.a GDPR)
First/last name (if requested in the form)	Personalization of communications	Consent (Art. 6.1.a GDPR)

Note on data collected at trade fairs: data collected via Google Form at events was subsequently transferred from the original Google spreadsheet to the Brevo platform (see section 2.3), which is now the current management tool. The original Google spreadsheet is retained as historical proof of how consent was collected, in accordance with the accountability principle set out in the GDPR, and is not used for any further processing.

2.3 Newsletter management and storage via Brevo

Regardless of the collection channel (website, Google Form at a trade fair, or other forms), all email addresses intended for the newsletter are managed and stored via Brevo (Sendinblue SAS), an email marketing platform with servers in the European Union (France/Germany).

For sign-ups collected directly via the form on the website, registration requires a double opt-in procedure: after signing up, the data subject receives a confirmation email and must click a link to finally activate the subscription.

Through Brevo we also process:

Data collected	Purpose	Legal basis
Technical data on email interaction (opens, clicks)	Improve the effectiveness of communications	Consent (Art. 6.1.a GDPR)

You can withdraw your consent and unsubscribe at any time by clicking the "Unsubscribe" link included in every email we send you, or by writing to us at the address indicated in Section 1. Unsubscribing is handled directly through Brevo and results in removal from the active sending lists.

Note: if in the future we use the mailing list for automated communications other than the general newsletter (e.g. specific updates related to orders or shipments), we will request separate and specific consent for that purpose.

3. Cookies

This website uses only technical cookies strictly necessary for its operation (e.g. managing the browsing session). We do not use profiling cookies, advertising tracking cookies, or traffic statistical-analysis tools. Consent is therefore not required for the use of these cookies, pursuant to Art. 122 of the Italian Privacy Code (Legislative Decree 196/2003) and Recital 30 of the GDPR.

Should non-technical cookies be introduced in the future (e.g. for statistical analysis tools), this policy will be updated and a dedicated consent banner will be activated, in compliance with the requirements of the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali).

4. How long we retain your data

Type of data	Retention period	
Technical website browsing data	Duration of the session	
Newsletter subscription (any source), managed via Brevo	Until unsubscription	
Original Google spreadsheet of contacts collected at trade fairs	Retained as historical proof of consent (GDPR accountability); not used for further processing	

Once these periods have elapsed, the data is deleted or anonymized, unless longer retention is required by legal obligations (e.g. tax-related).

5. Who we share your data with

We do not sell or transfer your personal data to third parties for commercial purposes unrelated to the OPENDRUMS project. Your data may be shared exclusively with:

- Brevo (Sendinblue SAS), for newsletter management and delivery, regardless of the channel through which you subscribed (website, trade fair, other forms)
- Google LLC (Search Console), for technical monitoring of the website's search-engine performance
- Public authorities, where required by law

Some of these parties may process data outside the European Economic Area (e.g. the United States). In such cases, the transfer takes place on the basis of adequate safeguards provided for by the GDPR, such as the EU-US Data Privacy Framework or the Standard Contractual Clauses.

6. Your rights

As a data subject, you have the right to:

- Access: obtain confirmation that we are processing your data and receive a copy of it
- Rectification: correct inaccurate or incomplete data
- Erasure ("right to be forgotten"): request the deletion of your data, within the limits provided by law
- Restriction: request the restriction of processing in certain cases
- Portability: receive your data in a structured format and transfer it to another controller
- Objection: object to processing based on legitimate interest
- Withdrawal of consent: withdraw consent given at any time (e.g. unsubscribing from the newsletter), without affecting the lawfulness of processing carried out before the withdrawal

To exercise these rights, please write to us at the address indicated in Section 1. You also have the right to lodge a complaint with the competent supervisory authority, in Italy the Garante per la Protezione dei Dati Personali (www.garanteprivacy.it).

7. Data security

We adopt appropriate technical and organizational measures to protect your personal data from unauthorized access, loss, destruction, or improper disclosure. However, no data transmission or storage system can guarantee absolute security.

8. Changes to this policy

This policy may be updated periodically, for example in the event of regulatory changes or new tools/services adopted by the project. The "last updated" date at the top of the document reflects the most recent revision. In the event of substantial changes, we will inform you via the website or, if you are subscribed, by email.

9. Contact

For any questions regarding this policy or the processing of your personal data:

Email: team@opendrums.it